

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**MICHAEL JENKINS, *et al.***

**Plaintiffs,**

**v.**

**RANKIN COUNTY, MISSISSIPPI, *et al.*,**

**Defendants.**

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**Civil Action No.  
3:23-cv-374-DPJ-ASH**

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES FROM DEFENDANT  
RANKIN COUNTY**

Come now, the Plaintiffs, by and through counsel, and pursuant to F.C.R.P. Rule 37 and hereby moves to compel discovery responses to Plaintiffs' Request for Documents #6, #15, #17, #23, #27, #29, and #30. Plaintiffs' Motion to Compel is related to Plaintiffs' request for production of IA investigation notes, IA findings, Garrity statements, body-worn camera footage, taser logs and personnel files. Plaintiffs shall file a separate Motion to Extend Discovery Deadline for the limited purposes of filing their Motion to Compel under separate cover.

In support of this motion, Plaintiffs submit the following exhibits:

- a. March 21, 2025 letter from Plaintiffs to defense counsel [ex. 1]
- b. March 26, 2025 email from defense counsel to Plaintiffs [ex. 2]
- c. Defendants answers to Plaintiffs' Req. for Production of Documents [ex.3]
- d. Def. supp. response to Plaintiff's Request for Prod of Documents [ex. 4]

Therefore, Plaintiffs move the court to compel production of document responses #6, # 15, 1s7, #23, #27, #28, and #30 from Defendant Rankin County

**CERTIFICATION OF COUNSEL**

Prior to filing this motion, Plaintiffs' counsel requested the documents sought to be compelled of Defendant Bailey through his counsel via conference call on 2/21/2025; Judicial conference call on 3/20/25; email on Friday 3/ 21, 2025 and emails on 3/26/ 2025. Defense counsel informed Plaintiffs' that he would not supplement RPD responses 23, 27, 29, 30, invoking Local Rule 7(b)(2)(C).

Respectfully submitted by:

/s/ MALIK SHABAZZ ESQ /S/

**MALIK SHABAZZ, Esq.**

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(Lead counsel for Plaintiff)

/S/ TRENT WALKER ESQ /S/

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 28th day of March 2025 I electronically transmitted this Motion to Compel to opposing counsel.

/s/Malik Z. Shabazz/s/

Malik Z. Shabazz Esq.